

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

In Re: Subpoena to Hurricane                    ) **Case No.: 1:19-mc-00250-JMS-RT**  
Electric, LLC                                         ) (Copyright)  
                                                              )  
                                                              ) DECLARATION OF BENNY NG  
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**DECLARATION OF BENNY NG**

BENNY NG, hereby declares under penalty of law that the following is true and correct.

1. I am over 18 years of age, am employed by HURRICANE ELECTRIC, LLC, and my official title is Director.

2. Hurricane Electric, LLC (“Hurricane”) received a Subpoena associated with the above captioned miscellaneous case number requesting customer information for the following Internet Protocol (“IP”) addresses on July 12, 2019.

No.	IP address	Hit Date	Infringing Website
1	2001:470:b07e: 0:d83a:a3ff:fe5e:ca	2018-09-19 12:27:05.71563+00	yts.ag
2	216.218.222.14	2018-08-24 14:34:20.29611+00	yts.am
3	216.218.222.12	2018-03-06 18:11:31.503688+00	yts.gg

4	65.19.167.130	2018-02-16 17:55:55.294389+00	yts.gg
5	216.218.222.14	2018-02-16 13:19:46.327169+00	yts.gg
6	65.19.167.130	2018-10-19 09:16:51.052958+00	yts.am

3. Hurricane offers a free tunnel broker service that enables users to reach the IPv6 Internet by tunneling over existing IPv4 connections from their IPv6 enabled host or router to one of our IPv6 routers. To use this service, users need to have an IPv6 capable host (IPv6 support is available for most platforms) or router which also has IPv4 (existing Internet) connectivity. Hurricane's tunnel service is oriented towards developers and experimenters that want a stable tunnel platform. *See* <https://tunnelbroker.net/>.

4. Hurricane's business records indicate that the user of the IP address 1 (2001:470:b07e:0:d83a:a3ff:fe5e:ca) is one of Hurricane's free tunnel users. The business records indicate the following customer information:

[REDACTED]  
[REDACTED]  
Hewitt, TX 76643  
[REDACTED]

The only authenticated info is the email.

Date/Time	IP	Action	TunnelID	Value
2019-04-30 17:59:16	130.45.86.189	delete_tunnel	494143	
2018-08-24 09:38:00	72.48.32.242	assign_48	494143	2001:470:b07e::
2018-08-24 09:27:19	72.48.32.242	assign_64	494143	2001:470:1d:da::
2018-08-24 09:27:19	72.48.32.242	create_tunnel	494143	

4. Hurricane's business records indicate that the customer for IP addresses Numbers 2-6 is the United States ("US") Naval Research Labs at 4555 Overlook Ave., Washington DC 20375. It is my understanding that the US Naval Research Labs uses these IP addresses to run a TOR exit relay.

5. We do not manage the servers associated with the IP addresses 2-6. We provide our clients with colocation services, meaning physical space for their hardware, an Internet connection and IPs.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Fremont, California, July 31, 2019

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Benny Ng

A handwritten signature in black ink, appearing to read 'B. Ng', with a stylized flourish at the end.